

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

In re:) Case No. 22-12930
Aurora Hospitality Group LLC) Chapter 11
Debtor.) Hon. LaShonda A. Hunt

**AFFIDAVIT OF DAVID FREYDIN IN SUPPORT OF
DEBTOR'S MOTION TO EMPLOY BANKRUPTCY COUNSEL**

David Freydin, hereby state under penalty of perjury, as follows:

1. I am an attorney duly licensed and authorized to practice law, and I am a member in good standing of the Bar of the State of Illinois and the United States District Court for the Northern District of Illinois.

2. I submit this declaration in support of the entry of an order authorizing the retention of myself and The Law Offices of David Freydin PC (collectively, the “Firm”) as bankruptcy counsel for the Aurora Hospitality Group LLC. (the “Debtor”) pursuant to 11 U.S.C. §§ 327(a), 328(a), and 329 and to comply with 11 U.S.C. § 504 of the Bankruptcy Code and Bankruptcy Rules 2014 and 2016.

3. I have experience and knowledge in bankruptcy law, the Debtor's business operations and the real estate industry and believe that the Firm is well qualified to serve as counsel for the Debtor.

4. Pursuant to Fed.R.Bankr.P. 2014(a), in connection with representing the Debtor, I have reviewed the list of the Debtor's creditors. Based upon that review, to the best of my knowledge, information and belief, the Firm does not represent any party in interest in this case.

5. Pursuant to 11 U.S.C. § 327(a), neither I nor the Firm are creditors of the estate in the above-captioned bankruptcy case and I do not represent or hold any interests that are adverse to the estate.

6. To the best of my knowledge, the Firm does not have any connections with the United States Trustee, or any person employed in the office of the United States Trustee, nor is any person connected with the Firm a relative of the Bankruptcy Judge assigned to the Case. Further, the Firm has no connections with the Chapter V trustee assigned in this case.

7. The Firm has not entered into any arrangement to share any compensation that may be awarded by the Court, except as permitted under section 504(b) of the Bankruptcy Code.

8. The Firm's compensation shall be on an hourly basis based on the following rates and subject to approval by this court: David Freydin \$350 per hour and Jan Michael Hulstedt \$325 per hour, Dustin Allen \$325 per hour, Jeremy Nevel \$325 per hour.

9. Based on the foregoing, I believe I and the employees of the Firm are disinterested persons within the meaning of §101(14) of the Bankruptcy Code.

10. I will seasonally amend this Declaration to the extent that I become aware of relationships for which disclosure is appropriate.

Dated: November 23, 2022

/s/ David Freydin
David Freydin

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